



Application granted. Probation may unseal and provide the requested records to the Government, which of course must comply with its disclosure obligations.

U.S. Department of Justice

United States Attorney
Southern District of New York

SO ORDERED.


CATHY SEIBEL, U.S.D.J.

11/10/22

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 10, 2022

Via ECF & E-Mail

Honorable Cathy Seibel
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *United States v. Roberto Margolla*, ^{13-CR-880}~~18-cr-880~~ (CS)

Dear Judge Seibel:

The Government submits this letter, with the consent of the United States Probation Office ("Probation"), to respectfully request the unsealing of records maintained by Probation regarding Roberto Margolla's supervision, including internal chronologies and other records detailing and pertinent to (1) Margolla's arrests in 2021 and 2022 by the Middletown Police Department, (2) statements made by Margolla and any other victim and/or witness in connection with those arrests, and (3) any other information or evidence relating to the specifications alleged in the above-referenced proceeding regarding Margolla's violation of supervised release ("VOSR").

The Court has scheduled a VOSR hearing in this case for November 22, 2022. The parties are in discussions regarding a potential for a disposition. Should the parties not reach a disposition, however, the Government intends to prove at the upcoming hearing the specifications set forth in the June 24, 2022 Violation Report, as revised November 9, 2022. The Government expects that it may call the defendant's Probation Officer to testify and that it may seek to admit evidence obtained through Probation's investigation of the specifications at the anticipated hearing, or any related sentencing proceeding. The Government therefore seeks these records from the Probation Office in order to comply with its disclosure obligations.

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For these reasons, the Government respectfully requests that the Court grant this application permitting Probation to disclose the relevant records.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
Ben Arad / Kevin Sullivan
Assistant United States Attorneys
(914) 993-1907 / 1924

Cc: Richard Willstatter, Esq. (via ECF and E-Mail)